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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANE DOE,

Plaintiff

v.

LOMBARDO ET AL,

Defendant

**PROPOSED DEFENDANT-
INTERVENOR'S MOTION for
HEARING/ORAL ARGUMENT**

Case No.: 3:24-cv-00065

Proposed defendant-intervenor comes now and says:

INTRODUCTION

On September 5th, 2022, a fire broke out at the former Cotton Tail brothel ranch site in Esmeralda County, Nevada. *Long-Shuttered Cottontail Ranch Brothel Burns Down*. Las Vegas Review Journal. (2022).

On September 14th, 2023, a year after the Cotton Tail fire, the Kit Ranch brothel in Lyon County caught fire. *Fire Breaks Out at Kit Kat Ranch Brothel; Investigation Underway*. 2NewsNevada. (2023).

Were these fires freak accidents? Or were they fires set by arsonists inspired by the rhetoric of Jason Guinasso and the National Center of Sexual Exploitation.

The below facts will show that Mr. Guinasso's rhetoric is causing violence and spreading fear. He has lost the privilege of being a lawyer.

Proposed Intervenor requests a hearing because Intervenor doesn't think this Court understands the gravity of this matter. This isn't merely a case of Jane Does suing over alleged trafficking. This is a case of a pastor, who also is a lawyer, who has used his status to spread fear and try to outlaw prostitution in any and every way possible. It needs to stop.

Even if Greer is not granted intervention, Greer at least needs a green light from this Court to at least begin the process of disbarment of Mr. Guinasso for bringing his third frivolous claim, not even a year after his second dismissal. This green light is needed because the Nevada State Bar says they cannot act until they get notice of some factual finding from the Courts. A hearing can assist the Court better than motions can.

Reasons for a Hearing

The main reason for a hearing is because Mr. Guinasso has used his position as a lawyer to spread fear about the Nevada brothel industry. Quoting District of Colorado Judge Neureiter, who was overseeing a sanctions hearing regarding lawyers bringing forth "Stolen Election 2020"

claims, he stated: “This lawsuit has been used to manipulate gullible members of the public and torment public unrest.” *Sanctions stand for lawyers in frivolous 2020 election lawsuit involving Michigan*. Michigan Advance. (2023). (<https://michiganadvance.com/briefs/sanctions-stand-for-lawyers-in-frivolous-2020-election-lawsuit-involving-michigan/>). See also: Motion Granting Sanctions for O’Rourke v. Dominion Voting Systems . (<https://law.justia.com/cases/federal/district-courts/colorado/codce/1:2020cv03747/203235/136/>).

As will be shown below, gullible members of the public see a lawyer (Guinasso) claim something and because Guinasso is a lawyer, they take it as truth because lawyers take an oath to be honest. Intervenor believes those same gullible public members are the ones who burned down the two brothels.

1. Spreading Fear Through His Position as a Lawyer

As the County defendants pointed out, shortly after this lawsuit was filed, Guinasso and Co. held a news conference. Few Nevada publications picked up the case because in their eyes, three times *isn’t* a charm. Some publications did carry the story, see: Courthouse News Service: “Nevada’s Legal Brothels Facilitate Trafficking, Lawsuit Says.” Courthouse News Service. (2024). The way the article is written doesn’t present the claims as just that — claims — it presents the allegations as truth, evidenced in the article’s summary: “The state's system of legal prostitution amounts to sex trafficking, according to a woman who said she was trapped and exploited in the system for years.”

Does that seem like objective reporting? The reporter, Mark Hebert, spins the lawsuit as fact because a lawyer has filed it. Some of the public shared the article as fact. **EXHIBIT A.**

But this isn’t the first time Guinasso has spread public fear about brothels. Indeed, in 2019 and 2022, when Guinasso filed cases #1 and #2, he held pressers and had news outlets share the lawsuits.

Not stopping just at press releases, Mr. Guinasso has written countless op eds about seeking to abolish brothels. See: *We Must End Prostitution in Lyon County — and Nevada*. The Nevada Independent. (2018). (https://thenevadaindependent.com/article/we-must-end-legal-prostitution-in-lyon-county-and-nevada?fbclid=IwY2xjawFygCpleHRuA2FlbQIxMQABHcdUsyXaX_QG4kESY_gCHjGe1F_SKP21bMcLPgs24DzAwksLd65jDk7JEq_aem_5F5h9WQzT13_ixJqshy8hA). Guinasso also led failed ballot initiatives in 2018 to try to outlaw brothels.

2. Clear FRCP 11 Violations

This is the nail in the coffin for Guinasso because while he is free to have First Amendment rights, he is not free to advocate for those views in the courtroom. This sentiment was shared by judges who disbarred lawyers for bringing forth frivolous election interference suits. The 3 brothel lawsuits seem to have interjected Guinasso's personal views with unproven state sanctioned trafficking claims.

The Court should also take notice that Mr. Guinasso is the ONLY Nevada attorney bringing these lawsuits. If there was wide spread trafficking, why is no other lawyer bringing these lawsuits? And as Greer pointed out in his Motion to Intervene, it's almost magical that these women are somehow approaching him for representation. It's almost comical that this Jane Doe decided the first thing she wanted to do after getting kicked out of the Mustang, was to contact Guinasso to sue the laws as unconstitutional, as compared to just moving on with her life. It's just honestly ludicrous.

With this all considered, Guinasso has clearly violated FRCP 11 by putting his signature on these complaints and bringing forth claims already dismissed and litigated. The above op eds of his and his failed ballot measures proves that the lawsuits are being brought in bad faith and is thus an FRCP 11 violation because he isn't advocating for supposed trafficking victims — he's advocating for his greedy, frivolous self.

There is no doubt in Intervenor's mind that the brothel fires were caused by fearful members of the public. Notice the fires didn't start until after the 1 and 2 lawsuits were publicized and after Guinasso wrote his op eds.

3. Written words can only convey so much

Hearings are good because it gives the chance for the Court to ask questions, instead of reading a motion and accepting or declining the motion.

Intervenor would also like to present witnesses who believe this present case is frivolous.

An order to show the state bar

Even if the Court denies Greer intervention, Greer would still like some kind of Order to fine with a Bar Complaint because Greer has previously complaint of Guinssso's conduct and the State Bar said they needed an order from the Court to consider sanctions or disbarment.

Greer fears these brothel burnings will escalate to actual violence (like brothel owners getting shot) if Guinasso continues to use his position as a lawyer to spread fear. There is actual evidence of this fear. When Congressional Republicans were saying Democrats had children in the basements of pizza eateries, often referred to as "the Pizzagate conspiracy", it inspired a man named Edgar Welch to travel from North Carolina to a New York restaurant and he fired three shots into the ceiling of said restaurant. *Comet Pizza Gunman Pleads Guilty to Federal and Local Charges*. The Washington Post. (2017). (https://www.washingtonpost.com/local/public-safety/comet-pizza-gunman-to-appear-at-plea-deal-hearing-friday-morning/2017/03/23/e12c91ba-0986-11e7-b77c-0047d15a24e0_story.html). Other outlets dubbed this as "cybersteria". *With Pizzagate, is Cybersteria the New Normal?* Forbes. (2016). (<https://www.forbes.com/sites/fruzsinaeordogh/2016/12/07/with-pizzagate-is-cybersteria-the-new-normal/>).

Conclusion

Guinasso is creating hysteria with his rhetoric and these frivolous lawsuits. For the safety of everyone in this industry, a hearing is required to prevent a “Comet Pizza” type of shooting. This Court has already thrown out Guinasso’s state claims. There is no reason for sanctions to not move forward on that end.

Respectfully

DATED: October 8th, 2024

Russell Greer

Pro Se

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on September 10th, 2024, I served a true and correct copy of the attached document by Electronic Mail to all attorneys.

EXHIBT A

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[← Nevada's Legal Brothels Facilitate Traffickin...](#)

👍👎 152

👍 152

💬 8



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**Rex Smith**

Feb 9 • 🌐

DUH.

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in a city or if we weren't making enough money our

